

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

ST. CLAIR COUNTY EMPLOYEES')	Civil Action No. 3:18-cv-00988
RETIREMENT SYSTEM, Individually and on)	
Behalf of All Others Similarly Situated,)	<u>CLASS ACTION</u>
)	
Plaintiff,)	District Judge William L. Campbell, Jr.
)	Magistrate Judge Alistair E. Newbern
vs.)	
)	JOINT STATUS REPORT CONCERNING
ACADIA HEALTHCARE COMPANY, INC.,)	THE STATUS OF DISCOVERY AND
et al.,)	REQUEST FOR STATUS CONFERENCE
)	
Defendants.)	
)	
)	

Lead Plaintiffs and Class Representatives Chicago & Vicinity Laborers' District Council Pension Fund and New York Hotel Trades Council & Hotel Association of New York City, Inc. Pension Fund ("Plaintiffs"), and Defendants Acadia Healthcare Company, Inc., Joey A. Jacobs, Brent Turner, and David Duckworth (collectively, "Defendants," and together with Plaintiffs, "the Parties") submit this status report concerning their discovery efforts since the October 6, 2022 status conference and request an additional status conference to discuss the matters outlined below.

1. Since the October 6, 2022 telephonic status conference (ECF 180), the Parties have been diligently proceeding with discovery.

2. On December 2, 2022, the Court granted Defendants' motion requesting issuance of a letter of request for international judicial assistance from the Senior Master, Queen's Bench Division of the High Court of Justice of the United Kingdom for the purpose of obtaining documents from the Priory Group ("Priory") (the "December Letter of Request"). ECF 202. On January 16, 2023, the Senior Master gave effect to the December Letter of Request ("Senior Master's Order"). On January

27, 2023, Priory filed an objection to the Senior Master's Order and requested that the order be set aside or varied. Priory's objection to the Senior Master's Order concerning Priory documents is scheduled to be heard on April 25, 2023.

3. On January 13, 2023, the Court entered an amended letter of request for international judicial assistance to permit Plaintiffs to obtain deposition testimony from four individuals located in the United Kingdom. ECF 220. Plaintiffs have been informed by their United Kingdom counsel that the letter of request will be granted once Plaintiffs specify dates for the depositions. Given the relevance of the Priory documents to the four depositions, Plaintiffs have informed their United Kingdom counsel that they intend to await resolution of Priory's objection before proceeding with the depositions.

4. In addition, the Parties await rulings on the below motions/discovery disputes, which will guide the resolution of the Parties' impasse on certain discovery matters. Specifically, the Parties wish to discuss the following matters at the status conference:

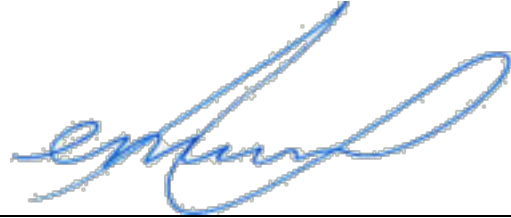
- (a) Plaintiffs' pending request for production of withheld ESI documents (ECFs 158, 160);
- (b) Defendants' pending Motion for Review of Nondispositive Order of Magistrate Judge (ECF 171);
- (c) Plaintiffs' Motion to Strike the declaration of David Hall (ECF 187); and
- (d) Defendants' Motion to Compel Nonparties Castalian Value Fund and Castalian Partners to Produce Documents and Testimony (ECF 193).

5. Further, per the Court's directive during the September 7, 2022 status conference, the Parties submitted competing case management proposals. ECF 173. On October 12, 2022, the Court informed the Parties that "[t]he scheduling issues raised in the parties' joint status report (Doc.

No. 173) will be addressed by further Court order.” ECF 185. Given the upcoming trial date of June 6, 2023, (ECF 155), the Parties seek clarity on the schedule or, alternatively, request the Court vacate the Amended Case Management Order. *Id.*

DATED: March 10, 2023

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 10, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ CHRISTOPHER M. WOOD

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